

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360

RCRA Compliance Inspection Report

I/S/D Facilities Checklist

A. General

Date 12/21/82 Time 9:00 a.m. EPA ID No. KSD000203638
 Facility Name Olin Water Services
 Street 3155 Fiberglass Road
 City Kansas City, Kansas Zip 66115
 County Wyandotte Phone 913-621-6440
 Contact Wilbur Bradley, Plant Manager; Larry Prouty, Production Foreman
 Inspector Randy Bradley
 Other _____

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<input type="checkbox"/> Chem/Phys/Bio Treatment	<input checked="" type="checkbox"/> Drums	<input type="checkbox"/> Incineration
<input type="checkbox"/> Filtration	<input type="checkbox"/> Pile	<input type="checkbox"/> Landfill
<input type="checkbox"/> Incineration	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Tank, Above ground	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Tank, Below ground	<input type="checkbox"/> Other ()
<input type="checkbox"/> Solvent Recovery	<input type="checkbox"/> Other ()	
<input type="checkbox"/> Thermal Treatment		
<input type="checkbox"/> Volume Reduction		
<input type="checkbox"/> Waste Oil		
<input type="checkbox"/> Other ()		

R00011097
RCRA Records Center

Comme

C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility?

☒ YES ☐ NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters.
2. Test methods which are used to test for these parameters.
3. Sampling method used to obtain sample.
4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current.
5. For off-site facilities, the waste analyses that generators have agreed to supply.
6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

☒ YES ☐ NO

YES ☐ NO ☒ NA

YES ☐ NO ☒ NA

Waste analysis plan requirements:

☒ Adequate ☐ Inadequate

D. Security

265.14

1. Does the facility provide either of the following:

- a. A 24-hour surveillance system? (T.V. monitoring or guards).

YES ☒ NO

- b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access).

☒ YES ☐ NO

2. Does the facility provide warning signs at entrances.
3. Does the facility consider itself exempt from security requirements?

YES NO

YES NO

Security requirements:

[X] Adequate [] Inadequate [] Not Applicable

E. General Inspection Requirements

265.15

1. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment

YES NO NA

monthly as part of plant policy.

b. Safety and emergency equipment

YES NO

c. Security devices

YES NO

d. Operating and structural equipment

YES NO NA

2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections?

YES NO

3. Does the owner/operator maintain an inspection log?

YES NO

a. If yes, does the log contain the:

1. Date and time of inspection

YES NO

2. Name of inspector

YES NO

3. Notation of observations

YES NO

4. Date and nature of repairs or remedial action

YES NO

Inspection requirements:

[X] Adequate [] Inadequate

F. Personnel Training

265.16

1. Does the owner/operator maintain at the facility, the following documents and records:

- a. Job title and job description for each position related to hazardous waste management. ☒ YES ☐ NO
- b. Description of type and amount of training to be given each person. ☒ YES ☐ NO
- c. Records of training given to facility personnel. ☒ YES ☐ NO

Personnel training requirements:

☒ Adequate ☐ Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

- | | | |
|--------|--|--|
| 265.17 | 1. Does the facility handle ignitable or reactive wastes? | <input checked="" type="radio"/> YES <input type="radio"/> NO |
| | a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
| | 2. Are smoking and open flames confined to specially designated locations? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
| | 3. Are "No Smoking" signs posted in hazard areas? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
| | 4. Does a check of these areas show any leakage or corrosion of containers? | YES <input checked="" type="radio"/> NO <input type="radio"/> NA |
| | 5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? | YES <input checked="" type="radio"/> NO <input type="radio"/> NA |

Ignitable, reactive, or incompatible waste requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

H. Preparedness and Prevention

- | | | |
|--------|---|--|
| 265.31 | 1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? | YES <input checked="" type="radio"/> NO <input type="radio"/> |
| 265.32 | 2. If applicable to the facility, is the facility equipped with: | |
| | a. Internal communication or alarm system easily accessible in case of emergency? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |
| | b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? | <input checked="" type="radio"/> YES <input type="radio"/> NO <input type="radio"/> NA |

3. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? ☒ YES ☐ NO ☐ NA
4. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? ☒ YES ☐ NO ☐ NA
- 265.33 5. Is this equipment (1-4 above) tested and maintained to assure its proper operation? ☒ YES ☐ NO ☐ NA
- 265.35 6. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? ☒ YES ☐ NO ☐ NA
- 265.37 7. If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? ☒ YES ☐ NO ☐ NA
8. In areas where more than one police and fire department might respond, is there one designated authority? YES ☐ NO ☒ NA
9. If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? YES ☐ NO ☒ NA
10. If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? ☒ YES ☐ NO ☐ NA
11. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? YES ☐ NO ☒ NA

Preparedness and prevention requirements:

☒ Adequate ☐ Inadequate

I. Contingency Plan and Emergency Procedures

- 262.53 1. Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services? ☒ YES ☐ NO
- 262.52 2. Does the plan describe arrangements made with emergency response personnel? ☒ YES ☐ NO

- 265.55
3. Does the plan list the name(s), home address, and phone number of the designated emergency coordinator(s)? ☒ YES ☐ NO
 4. Is an emergency coordinator available at all times? ☒ YES ☐ NO
 5. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? ☒ YES ☐ NO
 6. Does the plan include an evacuation plan for facility personnel? ☒ YES ☐ NO

Contingency plan and emergency procedures requirements:

☒ Adequate ☐ Inadequate

J. Manifest System, Recordkeeping, and Reporting

- 265.71
1. Does the facility receive waste from off-site? YES ☒ NO
 - a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? YES NO NA
 - b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? YES NO NA
 - c. Does the owner/operator retain a copy of manifest? YES NO NA
 2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? YES ☒ NO
 - a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? YES NO NA
 1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? YES NO NA
 2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? YES NO NA
 3. Does the owner/operator retain a copy of the shipping paper? YES NO NA
 - 365.72 3. Has the facility received any shipments of waste which were inconsistent with the manifest? YES NO ☒ NA

- a. If yes, was an attempt made to reconcile the discrepancy with the generator transporter? YES NO NA
1. If no, was the Regional Administrator notified? YES NO NA
- 265.73 4. Does the owner/operator keep a written operating record at the facility? YES NO
- a. If yes, does the operating record include:
1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? YES NO NA
2. The location of each hazardous waste within the facility and the quantity at each location? YES NO NA
- All wastes located in storage area.
3. Records and results of waste analyses? YES NO NA
4. Reports and details of incidents requiring implementation of the contingency plan? YES NO NA
- There have been no incidents requiring implementation.
5. Records and results of required inspections? YES NO NA
- In inspection log.
6. Monitoring, testing, or analytical data? YES NO NA
- In written analysis.
7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? YES NO NA
- 265.76 5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES NO NA
- a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO NA

Manifest system, recordkeeping, and reporting requirements:

[X] Adequate [] Inadequate

K. Closure and Post-Closure

- 265.112 1. Does the owner/operator have a written closure plan for the facility? YES NO
- a. If yes, does the plan include:
1. A description of how and when the facility will be closed? YES NO
- No estimate when the facility may be closed. No plans for plant closure.

2. A description of the steps necessary to completely close the facility? ☒ YES ☐ NO
3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? ☒ YES ☐ NO
4. A description of the steps needed to decontaminate facility equipment at the time of closure? ☒ YES ☐ NO
5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? No estimated year. ☒ YES ☐ NO

265.118

2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES NO ☒ NA
- a. If yes, does the plan include:
1. Ground-water monitoring activities and frequencies at which they will be performed? YES NO NA
2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES NO NA
3. The name, address, and phone number of the person or office to contact during the post-closure period? YES NO NA

Closure and post-closure requirements:

☒ Adequate ☐ Inadequate

L. Financial Requirements

- 265.142 1. Does the owner/operator have a written estimate of the closure cost? YES NO ☒ NA
- 265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). YES NO ☒ NA
- 265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? YES NO ☒ NA

265.145

4. Has the owner/operator of the disposal facility established financial assurance post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO ☒ NA

265.147

5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).
6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NO ☒ NAYES NO ☒ NA

Financial requirements:

☐ Adequate ☐ Inadequate ☒ NA

M. Management of Containers

265.170

1. Are containers presently used to store hazardous waste? ☒ YES NO
- a. If no, do not complete questions 2-5.
- b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

☒ Adequate ☐ Inadequate ☐ Not Applicable

265.173

2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

☒ YES NO NA

265.174

3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

☒ YES NO NA

4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?

5. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device?

Additional Information and CONCLUSIONS When the current accumulation of
wastes is disposed of, accumulation period will not exceed 90 days.

2

KS Gen file 5-17

State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360



December 28, 1982

Mr. Wilbur Bradley
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

RECEIVED
BUREAU OF

JAN 7 1983

ENVIRONMENTAL
SANITATION

RE: Resource Conservation and Recovery Act (RCRA)
Compliance Inspection

Dear Mr. Bradley:

On December 21, 1982 a RCRA inspection of your facility was conducted by this department to determine compliance with state and federal regulations concerning hazardous waste.

You notified the U. S. Environmental Protection Agency that you were a generator of hazardous waste. You, also, submitted a Part A application for Interim Status to operate as a treatment, storage, or disposal facility.

You were found to be in compliance with all state and federal regulations concerning generators and treatment, storage, and disposal facilities for hazardous waste.

The hazardous wastes that you currently have accumulated are primarily discontinued products. It is further noted that you are currently seeking to dispose of these materials. You stated that, once the accumulation is eliminated, you will no longer be accumulating materials. You, also, stated that you will probably be generating less than 100 kg/month. If you do not accumulate 1000 kg for more than 90 days, you may wish to contact our office by letter requesting that your firm be removed from the EPA's list of notifiers as a T/S/D facility. Please write to: John Paul Goetz, Hazardous Waste Management Section, Bureau of Environmental Sanitation, Kansas Department of Health and Environment, Forbes Field, Topeka, Kansas 66620.

Your cooperation with the Hazardous Waste Management Program is appreciated. If you have questions concerning the inspection, please call John Metzler or me at 913-441-4524.

Respectfully,

DIVISION OF ENVIRONMENT

Randy D. Bradley
Randy D. Bradley
Assistant District Engineer
Metropolitan District Office

cc: J. P. Goetz
Tom Gross
Metro. Dist. Office

RECEIVED
BUREAU OF
INVESTIGATION
FEDERAL BUREAU OF
INVESTIGATION

State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360



RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST

A. General

Date 12/21/82 Time 9:00 a.m. EPA ID No. KSD000203638
Facility Name Olin Water Services
Street 3155 Fiberglass Road
City Kansas City, Kansas Zip 66115
County Wyandotte Phone 913-621-6440
Contact Wilbur Bradley, Plant Manager; Larry Prouty, Production Foreman
Inspector Randy Bradley
Other _____

B. Hazardous Waste Determination

262.11

1. Does generator generate waste(s) listed in 261.31, 261.32, or 261.33? YES ☒ NO ☐
If yes, list waste(s), EPA Hazardous Waste No. according to computer printout, and quantity/month:

<u>EPA Hazardous Waste No.</u>	<u>Describe Waste Material</u>	<u>Quantity/Month</u>	<u>Method of Disposal</u>
--------------------------------	--------------------------------	-----------------------	---------------------------

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? YES ☒ NO ☐

- a. If yes, list waste(s), EPA Hazardous Waste No. according to computer printout, and quantity.

<u>EPA Hazardous Waste No.</u>	<u>Waste Material</u>	<u>Quantity/Month</u>	<u>Method of Disposal</u>
--------------------------------	-----------------------	-----------------------	---------------------------

See attached list.

- b. Do generator determine characteristics by testing or by applying knowledge of processes? Explain below:

Knowledge of processes.

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, or 261.24 or was equivalent test method used? _____

YES NO NA

- a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator?

YES NO

- a. If yes, list below:

Waste Description

Method of Disposal

Trash, pallets, drums, bags

Sanitary Landfill-
Deffenbaugh.

- b. Did the generator test these wastes to determine if hazardous?

YES NO NA

Explain if necessary:

4. Generator size classification:

- a. Does firm generate less than 100 kg of hazardous waste per month?

YES NO

- b. Does firm generate 100 kg or more but less than 1,000 kg. of hazardous waste per month (Kansas small quantity generator)?

YES NO

- c. Does firm generate more than 1,000 kg of hazardous waste per month (EPA generator)?

YES NO

*See comments.

Hazardous waste determination requirements:

[X] Adequate [] Inadequate

If generator generates less than 100 kg. of hazardous waste per month or accumulates less than 1,000 kg. stop here.

B. Hazardous Waste Determination

2. EPA Hazardous Waste No.	Waste Material	Quantity/ Month	Method of Disposal
D001, D002	Esther consisting of phosphoric acid and isopropyl alcohol.	15 drums in storage	Chemical wastes Management
D001	Resi-new (Sodium hydrosulfite, sodium sulfite)	7 drums in storage	"
D001	0822-37 fuel oil treatment compound	11 drums in storage	"
D001	Olin 3301 Biocide for cooling towers	14 drums in storage	"
D002	Olin 1562 Cooling tower treatment	2 drums in storage	"
D002	Olin 2100 Amino-tris-(methylphosphoric acid)	1 drum in storage	"
D007	Esther consisting of phosphoric acid and isopropyl alcohol	22 drums in storage	"
D007	Olin 2060 Cooling tower treatment	3 drums in storage	"
D007	Olin 2059 Cooling tower treatment	3 drums in storage	"

C. Manifests

1. Does generator ship waste off-site? Hasn't shipped yet. YES NO
- 262.21 a. If yes, does manifest include:
1. Manifest document number? YES NO
 2. Generator's name, address, phone number, and EPA ID number? YES NO
 3. Name and EPA ID number of each transporter? YES NO
 4. Name, address, and EPA ID number of designated facility? YES NO
 5. Name, address, and EPA ID number of alternate facility or instructions to return to generator if undeliverable? YES NO
 6. Waste information required by DOT-Shipping name, (49 CFR 172.101, 172.202, 172.203) total quantity, type and number of containers? YES NO
 7. Certification information - "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable regulations of DOT and EPA"? YES NO
- 262.23 b. Does generator retain copies of manifest? YES NO
If yes, complete 1 through 4.
1. Does generator sign and date all manifests by hand? YES NO NA
 2. Does generator obtain handwritten signature and date of acceptance from initial transporter? YES NO NA
 3. Does generator retain copy of manifest signed by both generator and transporter? YES NO NA
- 262.40 4. Does generator retain copy of manifest signed and dated by T/S/D facility owner/operator for three years? YES NO NA

Manifesting requirements:

☐ Adequate ☐ Inadequate

D. Pre-Transport Requirements Hasn't shipped yet.

- 262.30 1. Does generator package waste in accordance with DOT requirements (49 CFR 173, 178, and 179)? YES NO
- 262.31 2. Does generator label each package in accordance with DOT requirements (49 CFR 172)? YES NO
- 262.32 3. Does generator mark each package in accordance with DOT requirements (49 CFR 172)? YES NO
4. Does generator mark each container of 110 gallons or less as below: YES NO
- Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. E.P.A.
Generator's Name and Address _____
Manifest Document Number _____
- 262.33 5. Does generator have placards to offer to transporters (49 CFR 172, Subpart F)? YES NO

Pre-transport requirements:

[] Adequate [] Inadequate

E. Record Keeping and Reporting Hasn't shipped yet. Will keep copies of records for 3 years.

- 262.40 1. Does generator keep a copy of completed manifests from designated facilities for three years? YES NO
2. Does generator keep a copy of each Annual Report and Exception Report for three years? YES NO NA
3. Does generator keep records of test results and waste analyses used in determining hazardous or non-hazardous nature of wastes for three years? YES NO

Record keeping and reporting requirements:

[] Adequate [] Inadequate

F. Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? YES NO

a. ☐ If yes, has generator filed a ☐ ice with the Regional Administrator?

YES NO ☒ NA

b. Is waste manifested and signed by foreign cosignee?

YES NO ☒ NA

c. If generator transports wastes out of the country, has confirmation of delivered shipment been received?

YES NO ☒ NA

Special conditions requirements:

☒ Adequate ☐ Inadequate

If generator is a Kansas small quantity generator stop here.

G. Accumulation Time

262.34 1. Does generator temporarily store waste before transport for 90 days or less?

YES ☒ NO ☐ NA

a. If yes, is waste placed in containers?

YES NO ☐ NA

If yes,

1. Check overall condition of containers.

265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

YES NO ☐ NA

265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

YES NO ☐ NA

265.176 4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?

YES NO ☐ NA

265.177 5. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other device?

YES NO ☐ NA

b. If yes, is waste placed in tanks?

YES NO ☐ NA

If yes, fill out tanks checklist except 265.193.

2. Is the waste accumulation began clearly marked and visible for inspection on each container? YES
3. Is each containers and tank labeled or marked clearly with the words "Hazardous Waste"? YES

Note: If storage period exceeds 90 days then the facility is also a T/S/D facility.

Accumulation time requirements:

☐ Adequate ☐ Inadequate ☒ Not Applicable

H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)

1. Does the owner/operator maintain at the facility, the following documents and records:
 - a. Job title and job description for each position related to hazardous waste management? YES NO
 - b. Description of type and amount of training to be given each person? YES NO
 - c. Records of training given to facility personnel? YES NO

Personnel training requirements:

☐ Adequate ☐ Inadequate ☒ Not Applicable

2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):

265.31

- a. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES NO
- b. If applicable to the facility, is the facility equipped with:
 1. Internal communication or alarm system easily accessible in case of emergency? YES NO NA
 2. Telephone, hand-held two-way radio capable of summoning emergency response personnel? YES NO NA

- | | | | | | |
|--------|----|---|--------------------------------------|--------------------------|-------------------------------------|
| | c. | Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | d. | Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.33 | e. | Is this equipment (a-d above) tested and maintained to assure its proper operation? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.35 | f. | Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.37 | g. | If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | h. | In areas where more than one police and fire department might respond, is there one designated authority? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | i. | If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | j. | If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? Fairfax Clinic is familiar with facility's operations and materials used which are hazardous. | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | k. | In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |

Preparedness and prevention requirements:

[x] Adequate [] Inadequate [] Not Applicable

3. The generator who accumulates waste on-site must also meet the contingency plan and emergency procedures requirements (Subpart D):

- | | | |
|--------|---|--------|
| 265.53 | a. Is contingency plan maintained at facility and have copies been provided to outside agencies which may be called upon to provide emergency services? | YES NO |
| 265.52 | b. Does the plan describe arrangements made with emergency response personnel? | YES NO |
| | c. Does the plan list the name(s), home address, and phone numbers of designated emergency coordinator(s)? | YES NO |
| | d. Is an emergency coordinator available at all times? | YES NO |
| | e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? | YES NO |
| | f. Does the plan include an evacuation plan for facility personnel? | YES NO |

Contingency plan and emergency procedures requirements:

[X] Adequate [] Inadequate [] Not Applicable

Note: Determine if generator claims any information confidential.

Note: Complete section "I" only for those generators that also transport hazardous waste. This section should also be used for commercial transporting companies.

I. Transporter Requirements

1. In addition to the requirements for manifests given in section C(1)(a)(1) through section C(1)(a)(6) above, does the manifest include:

- | | | |
|--------|---|-----------|
| 263.20 | a. Signature of subsequent transporters, if any? | YES NO NA |
| | b. Signature signifying proper delivery to designated or alternate designated facility? | YES NO |
| | 2. If the transporter transports wastes outside of U.S. do manifests show date waste left U.S.? | YES NO NA |
| 263.22 | 3. Does transporter keep copy of the manifest signed by generator, himself, and the next designated transporter or owner of T/S/D facility for three years? | YES NO |

- | | | |
|---|-----|----|
| 4. All containers properly labeled and marked in accordance with DOT requirements (49 CFR 172)? | YES | NO |
| 5. Are vehicles properly placarded (49 CFR 172.500)? | YES | NO |

Transporter requirements:

Additional Information and CONCLUSIONS The facility is not currently generating hazardous waste. It does not anticipate exceeding a monthly generation rate of 100 kg/month after the present accumulation has been disposed of.

